

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY,

Plaintiff,

v.

WOLVERINE WORLD WIDE, INC.,

Defendant.

and

PLAINFIELD CHARTER TOWNSHIP
and ALGOMA TOWNSHIP,

Intervening Plaintiffs,

v.

WOLVERINE WORLD WIDE, INC.,

Defendant.

_____ /

WOLVERINE WORLD WIDE, INC.,

Third-Party Plaintiff,

v.

3M Corporation,

Third-Party Defendant.

_____ /

No. 1:18-cv-00039-JTN-SJB

HON. JANET T. NEFF

MAG. SALLY J. BERENS

**NOTICE OF LODGING OF
PROPOSED CONSENT DECREE**

Polly A. Synk (P63473)
Danielle Allison-Yokom (P70950)
Brian J. Negele (P41846)
Assistant Attorneys General
Attorneys for Plaintiff
Environment, Natural Resources, and
Agriculture Division
P.O. Box 30755
Lansing, MI 48909
(517) 335-7664
synkp@michigan.gov
allisonyokomd@michigan.gov
negeleb@michigan.gov

Douglas W. Van Essen (P33169)
Elliot J. Gruszka (P77117)
Silver & Van Essen, P.C.
Attorneys for Intervening Plaintiffs
300 Ottawa Avenue NW, Suite 620
Grand Rapids, MI 49503
(616) 988-5600
dwv@silvervanessen.com
egruszka@silvervanessen.com

Daniel L. Ring
Michael A. Olsen
Richard F. Bulger
Timothy S. Bishop
Mayer Brown
Attorneys for Third-Party Defendant 3M
Corporation, Inc.
71 S. Wacker Drive
Chicago, IL 60606
(312) 782-0600
dring@mayerbrown.com
molsen@mayerbrown.com
rbulger@mayerbrown.com
tbishop@mayerbrown.com

John V. Byl (P35701)
James Moskal (P41885)
Scott M. Watson (P70185)
Warner Norcross & Judd LLP
Attorneys for Defendant/Third-Party
Plaintiff
111 Lyon Street NW, Suite 900
Grand Rapids, MI 49503
(616) 752-2000
jbyl@wnj.com
jmoskal@wnj.com
swatson@wnj.com

Joe G. Hollingsworth
Frank Leone
Attorneys for Defendant/Third-Party
Plaintiff
Hollingsworth LLP
1350 I Street, N.W.
Washington, DC 20005
(202) 898-5800
jhollingsworth@hollingsworthllp.com
fleone@hollingsworthllp.com

Harold A. Barza
Johanna Y. Ong
Joe M. Paunovich (P65340)
Valerie Roddy
Attorneys for Defendant/Third-Party
Plaintiff
Quinn Emanuel Urquhart &
Sullivan, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000
halbarza@quinnemanuel.com
johannaong@quinnemanuel.com
joepaunovich@quinnemanuel.com
valerieroddy@quinnemanuel.com

NOTICE OF LODGING OF PROPOSED CONSENT DECREE

Plaintiff, Michigan Department of Environmental Quality¹ (MDEQ),
Intervening Plaintiffs, Plainfield Charter Township and Algoma Township, and
Defendant, Wolverine World Wide, Inc., hereby give notice to the Court of lodging a
Consent Decree in the above-referenced case.

The Consent Decree will be subject to a short public comment period.

The Parties anticipate filing a Motion for Entry of Proposed Consent Decree
on or around February 14, 2020. The State plans to submit a responsiveness
summary addressing comments received along with the Motion for Entry.

In order to begin construction of the municipal water service system this
construction season, the Parties respectfully request the Court to review and enter
as expeditiously as possible the Consent Decree after the Motion for Entry is filed
on or around February 14, 2020.

Dated: February 3, 2020

/s/ Danielle Allison-Yokom
Polly A. Synk (P63473)
Danielle Allison-Yokom (P70950)
Brian J. Negele (P41846)
Assistant Attorneys General
Attorneys for Plaintiff

/s/ Scott M. Watson
John V. Byl (P35701)
Madelaine C. Lane (P71294)
Janet L. Ramsey (P63285)
James Moskal (P41885)
R. Michael Azzi (P74508)
Scott M. Watson (P70185)
Warner Norcross & Judd LLP
Attorneys for Defendant

¹ Pursuant to Executive Order 2019-06, effective April 22, 2019, the Department of
Environmental Quality was renamed the Department of Environment, Great Lakes,
and Energy.

/s/ Douglas W. Van Essen

Douglas W. Van Essen (P33169)

Elliot J. Gruszka (P77117)

Silver & Van Essen, P.C.

Attorneys for Intervening Plaintiffs